

PELTON & ASSOCIATES, PC

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**ZHANG HAI JUN, Individually and on
Behalf of All Others Similarly Situated,**

Plaintiffs,

-against-

**NEW OZEN ASIAN FUSION CUISINE
INC., OZEN ASIAN FUSION CUISINE
INC., HANG BO LIN, LING LIN and QIU
JIAN LIN, Jointly and Severally,**

Defendants.

ECF Case

11 Civ. 7357 (JMF)

**NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL
OF THE SETTLEMENT AND ATTORNEYS' FEES AND COSTS**

For the reasons set forth in the Memorandum of Law in Support of Plaintiff's Unopposed Motion for Approval of the Settlement and Attorneys' Fees and Costs, the Declaration of Brent E. Pelton, and the supporting exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order:

- (1) Approving the parties' settlement agreement and release of claims in the above-referenced action; and
- (2) Awarding attorneys' fees and reimbursement of reasonable litigation costs and expenses to Plaintiff's counsel.

Plaintiff has contemporaneously submitted a Proposed Order, attached hereto as **Exhibit A**, for the Court's convenience.

Dated: March 15, 2013
New York, New York

Respectfully submitted,

PELTON & ASSOCIATES, PC

By: /s/ Brent Pelton
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